

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

KAILA GONZALEZ, Individually and as a
Representative of a class of similarly
situated persons, on behalf of the
NORTHWELL HEALTH 403(B) PLAN,

Plaintiff,

-against-

NORTHWELL HEALTH, INC., the
NORTHWELL HEALTH 403(B) PLAN
COMMITTEE and DOES No. 1-10,
Whose Names Are Currently Unknown,

Defendants.

1:20-cv-03256 RPK RLM

DECLARATION OF MELISSA D. HILL

I, Melissa D. Hill, being of full age, certify and state as follows:

I am an attorney at law in the State of New York, a Partner with the law firm of Morgan, Lewis & Bockius LLP, and attorney for Defendants Northwell Health, Inc. (“Northwell”) and the Northwell Health 403(B) Plan Committee (collectively, “Defendants”). I submit this Declaration in connection with Defendants’ Motion to Dismiss the Complaint.

1. Attached as Exhibit 1 is a true and correct copy of the Northwell Health 403(b) Plan’s (the “Plan”) 2020 Participant Disclosure Notice (“Annual Fee Disclosure”).

2. Attached as Exhibit 2 is a true and correct copy of the Plan’s 2014 Annual Fee Disclosure.

3. Attached as Exhibit 3 is a true and correct copy of the Plan’s 2019 Annual Fee Disclosure.

4. Attached as Exhibit 4 is a true and correct copy of Plaintiff's June 2020 Quarterly Plan Account Statement.

5. Attached as Exhibit 5 is a true and correct copy of the Plan's 2015 Annual Fee Disclosure.

6. Attached as Exhibit 6 is a true and correct copy of the Plan's 2016 Annual Fee Disclosure.

7. Attached as Exhibit 7 is a true and correct copy of the Plan's 2018 Annual Fee Disclosure.

8. Attached as Exhibit 8 is a true and correct copy of the 2019 Diamond Hill Large Cap Fund ("DHLAX") Summary Prospectus.

9. Attached as Exhibit 9 is a true and correct copy of the 2019 Dodge & Cox Stock Fund ("DODGX") Summary Prospectus.

10. Attached as Exhibit 10 is a true and correct copy of the 2019 Champlain Small Company Fund ("CIPSX") Summary Prospectus.

11. Attached as Exhibit 11 is a true and correct copy of the 2019 Diamond Hill Small-Mid Cap Fund ("DHMAX") Summary Prospectus.

12. Attached as Exhibit 12 is a true and correct copy of the 2019 Lazard Emerging Markets Fund ("LZEMX") Summary Prospectus.

13. Attached as Exhibit 13 is a true and correct copy of the 2019 Causeway International Value Fund ("CIVVX") Summary Prospectus.

14. Attached as Exhibit 14 is a true and correct copy of the 2019 Dreyfus International Stock Fund Summary Prospectus ("DISRX" or "BNY Mellon International Option Summary Prospectus").

15. Attached as Exhibit 15 is a true and correct copy of the relevant pages of the 2019 Lazard Emerging Markets Fund (“LZEMX”) Annual Report.

16. Attached as Exhibit 16 is a true and correct copy of the relevant pages of the 2019 Causeway International Value (“CIVVX”) Fund Annual Report.

17. Attached as Exhibit 17 is a true and correct copy of the relevant pages of the 2019 BNY Mellon International Option (“DISRX”) Annual Report.

18. Attached as Exhibit 18 is a true and correct copy of the relevant pages of the 20th edition of the 401k Averages Book by Joseph W. Valletta.

19. Attached as Exhibit 19 is a true and correct copy of the 2020 iShares MSCI EAFE International Index Fund (“MDIIX”) Summary Prospectus.

20. Attached as Exhibit 20 is a true and correct copy of the 2016 Vanguard Russell 1000 Value Index Fund (“VRVIX”) Summary Prospectus.

21. Attached as Exhibit 21 is a true and correct copy of the 2017 Vanguard Russell 1000 Value Index Fund (“VRVIX”) Summary Prospectus.

22. Attached as Exhibit 22 is a true and correct copy of the 2018 Vanguard Russell 1000 Value Index Fund (“VRVIX”) Summary Prospectus.

23. Attached as Exhibit 23 is a true and correct copy of the 2019 Vanguard Russell 1000 Value Index Fund (“VRVIX”) Summary Prospectus.

24. Attached as Exhibit 24 is a true and correct copy of the September 30, 2020 Vanguard Russell 1000 Value Index Fund (“VRVIX”) Fact Sheet.

25. Attached as Exhibit 25 is a true and correct copy of the Plan’s 2017 Annual Fee Disclosure.

26. Attached as Exhibit 26 is a true and correct copy of the relevant pages of the 2019

Fidelity Emerging Markets Index Fund (“FPADX”) Annual Report.

27. Attached as Exhibit 27 is a true and correct copy of the relevant pages of the 2019 2019 iShares MSCI EAFE International Index Fund (“MDIIX”) Annual Report.

28. Attached as Exhibit 28 is a true and correct copy of the 2015 “iShares MSCI EAFE Int’l Index Fund (“MDIIX”) Summary Prospectus.

29. Attached as Exhibit 29 is a true and correct copy of the 2017 iShares MSCI EAFE International Index Fund (“MDIIX”) Summary Prospectus.

30. Attached as Exhibit 30 is a true and correct copy of the 2018 iShares MSCI EAFE International Index Fund (“MDIIX”) Summary Prospectus.

31. Attached as Exhibit 31 is a true and correct copy of the 2019 iShares MSCI EAFE International Index Fund (“MDIIX”) Summary Prospectus.

I hereby certify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

/s/ Melissa D. Hill
Melissa D. Hill

Executed: December 18, 2020